

JRS:AMR/RWN
F. #2022R00986

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

JAMEL WOODS,
also known as "Richard Carter,"
JUANITA EVANS,
TROY MELVILLE,
[REDACTED]

DESMOND ROBERTSON and
RAPHAEL WILLIAMS,
also known as "Fatboy,"

Defendants.

----- X

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Superseding Indictment, unless otherwise indicated:

I. The Altered Treasury Checks Scheme

1. The United States Department of the Treasury issued checks ("U.S. Treasury checks") on behalf of various federal government agencies to payees. Financial institutions verified the issue date, serial number and amount of a U.S. Treasury check before accepting it for deposit. The payee's name, however, was not verified as part of this process. Therefore, if the payee's name was altered on the face of a U.S. Treasury check, the deposit may not have been identified as fraudulent.

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
* FEBRUARY 8, 2024 *
BROOKLYN OFFICE

S U P E R S E D I N G
I N D I C T M E N T

Cr. No. 23-297 (FB)
(T. 18, U.S.C., §§ 286, 982(a)(2),
982(b)(1), 1028A(a)(1), 1028A(b),
1028A(c)(5), 1344, 1349, 2 and 3551 et
seq.; T. 21, U.S.C., § 853(p))

2. Bank-1, Bank-2, Bank-3, Bank-4, Bank-5, Bank-6, Bank-7 and Bank-8, entities the identities of which are known to the Grand Jury, were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

3. In or about and between November 2021 and December 2022, the defendants JAMEL WOODS, also known as “Richard Carter,” JUANITA EVANS, TROY MELVILLE [REDACTED] DESMOND ROBERTSON and RAPHAEL WILLIAMS, also known as “Fatboy,” and others engaged in a fraudulent scheme to deposit over \$295,000 worth of altered U.S. Treasury checks into bank accounts controlled by the defendants and their co-conspirators and then withdraw or transfer funds from these accounts before the fraud was detected.

A. The November 23, 2021 Deposits

4. On or about November 15, 2021, a U.S. Treasury check bearing serial number 53806584 in the amount of \$1,050.00 was issued by the Internal Revenue Service (“IRS”) to payees located in Brooklyn, New York. On or about the same date, a U.S. Treasury check bearing serial number 54339575 in the amount of \$334.00 was issued by the IRS to payees located in Brooklyn, New York. The names and addresses on these U.S. Treasury checks were subsequently altered to the name and address of the defendant [REDACTED] On or about November 23, 2021, these altered U.S. Treasury checks were deposited into an account at Bank-1 with an account number ending in 9972, which belonged to [REDACTED] Account 1”).

5. On or about November 23, 2021, an electronic transfer in the amount of \$1,000 was made from [REDACTED] Account 1 to an account at Bank-2 with an account number ending in 8408, which belonged to the defendant JAMEL WOODS (“WOODS Account 1”).

B. The November 24, 2021 Deposit

6. On or about May 25, 2021, a U.S. Treasury check bearing serial number 69084788 in the amount of \$125,965.02 was issued by the IRS to a payee located in Brooklyn, New York. The name and address on this U.S. Treasury check were subsequently altered to the name and address of the defendant DESMOND ROBERTSON. On or about November 24, 2021, this altered U.S. Treasury check was deposited into an account at Bank-1 with an account number ending in 7790, which belonged to ROBERTSON (“ROBERTSON Account 1”).

7. On or about December 2, 2021, a cashier’s check for \$45,000.00 was withdrawn from ROBERTSON Account 1 and made payable to the defendant JAMEL WOODS. On or about December 7, 2021, that cashier’s check was deposited into WOODS Account 1.

C. The December 1, 2021 Deposit

8. On or about November 5, 2021, a U.S. Treasury check bearing serial number 81230627 in the amount of \$15,042.99 was issued by the IRS to a payee located in Brooklyn, New York. The name and address on this U.S. Treasury check were subsequently altered to the name and address of the defendant JAMEL WOODS. On or about December 1, 2021, this altered U.S. Treasury check was deposited into WOODS Account 1.

9. On or about December 1, 2021, withdrawals were made from WOODS Account 1 in the amounts of \$800 and \$200. On or about December 2, 2021, withdrawals were made from WOODS Account 1 in the amounts of \$5,500, \$2,500, \$800 and \$400.

D. The March 9, 2022 Deposit

10. On or about March 4, 2022, a U.S. Treasury check bearing serial number 85835450 in the amount of \$2,440.47 was issued by the IRS to a payee located in New York, New York. The name and address on this U.S. Treasury check were subsequently altered to the

name and address of the defendant TROY MELVILLE. On or about March 9, 2022, this altered U.S. Treasury check was deposited into an account at Bank-1 with an account number ending in 9544, which belonged to MELVILLE (“MELVILLE Account 1”).

E. The March 16, 2022 Deposit

11. On or about March 9, 2022, a U.S. Treasury check bearing serial number 86204293 in the amount of \$25,000.00 was issued by the IRS to payees located in Brooklyn, New York. The names and address on this U.S. Treasury check were subsequently altered to the name and address of the defendant TROY MELVILLE. On or about March 16, 2022, this altered U.S. Treasury check was deposited into MELVILLE Account 1.

12. On or about March 16, 2022, two electronic transfers in the amounts of \$1,000.00 and \$1,400.00 were made from MELVILLE Account 1 to WOODS Account 1. On or about March 23, 2022, withdrawals were made from MELVILLE Account 1 in the amounts of \$9,500 and \$800. On or about the same day, an electronic transfer in the amount of \$11,000 was made from MELVILLE Account 1 to an account at Bank-1 with an account number ending in 9557, which belonged to the defendant TROY MELVILLE (“MELVILLE Account 2”). On or about March 24, 2022, withdrawals were made from MELVILLE Account 1 in the amounts of \$700, \$500, \$800 and \$200. On or about March 28, 2022, a withdrawal was made from MELVILLE Account 1 in the amount of \$11.86, leaving no funds remaining in MELVILLE Account 1.

F. The May 2, 2022 Deposit

13. On or about April 1, 2022, a U.S. Treasury check bearing serial number 88822690 in the amount of \$18,780.96 was issued by the IRS to payees located in Brooklyn, New York. The names and address on this U.S. Treasury check were subsequently altered to

the name and address of the defendant JAMEL WOODS. On or about May 2, 2022, this altered U.S. Treasury check was deposited into an account at Bank-3 with an account number ending in 6920, which belonged to WOODS (“WOODS Account 2”).

14. On or about May 3, 2022, a withdrawal was made from WOODS Account 2 in the amount of \$5,600. On or about May 6, 2022, withdrawals were made from WOODS Account 2 in the amounts of \$9,000 and \$4,200.

G. The June 27, 2022 Deposit

15. On or about May 31, 2022, a U.S. Treasury check bearing serial number 01832481 in the amount of \$57,378.49 was issued by the IRS to a payee located in New York, New York. The name and address on this U.S. Treasury check were subsequently altered to the name and address of the defendant RAPHAEL WILLIAMS. On or about June 27, 2022, this altered U.S. Treasury check was deposited into an account at Bank-3 with an account number ending in 1609, which belonged to WILLIAMS (“WILLIAMS Account 1”).

16. On or about July 7, 2022, two attempted payments in the amounts of \$2,600.00 and \$1,000.00 were sent from a Cash App account with the username “universoleyoung,” which belonged to the defendant RAPHAEL WILLIAMS (“WILLIAMS Cash App Account 1”), to a Cash App account with the username “mellyg718,” which belonged to the defendant JAMEL WOODS. These two payments were not successfully transmitted. On or about the same date, withdrawals were made from WILLIAMS Account 1 in the amounts of \$8,500 and \$9,000.

H. The July 6, 2022 Deposits

17. On or about April 26, 2022, a U.S. Treasury check bearing serial number 92842343 in the amount of \$334.00 was issued by the IRS to payees located in Brooklyn, New

York. On or about April 29, 2022, a U.S. Treasury check bearing serial number 93773963 in the amount of \$341.25 was issued by the IRS to payees located in Brooklyn, New York. On or about April 29, 2022, a U.S. Treasury check bearing serial number 93774064 in the amount of \$221.00 was issued by the IRS to payees in Brooklyn, New York. The names and addresses on these U.S. Treasury checks were subsequently altered to the name and address of the defendant JUANITA EVANS. On or about July 6, 2022, these altered U.S. Treasury checks were deposited into an account at Bank-4 with an account number ending in 2684, which belonged to EVANS (“EVANS Account 1”).

18. On or about July 6, 2022, an electronic transfer in the amount of \$895.00 was made from EVANS Account 1 to an account at Bank-8 with an account number ending in 1864, which belonged to the defendant JAMEL WOODS.

I. The September 27, 2022 Deposit

19. On or about September 2, 2022, a U.S. Treasury check bearing serial number 06062927 in the amount of \$33,927.43 was issued by the IRS to a payee in Brooklyn, New York. The name and address on this U.S. Treasury check were subsequently altered to the name and address of the defendant JUANITA EVANS. On or about September 27, 2022, this altered U.S. Treasury check was deposited into an account at Bank-3 with an account number ending in 1395, which belonged to EVANS (“EVANS Account 2”).

20. On or about September 30, 2022, a withdrawal was made from EVANS Account 2 in the amount of \$6,000. On or about October 6, 2022, withdrawals were made from EVANS Account 2 in the amounts of \$9,550, \$9,400, \$3,000, \$2,000, and \$1,000.

J. The December 28, 2022 Deposit

21. On or about November 1, 2022, a U.S. Treasury check bearing serial number 11314047 in the amount of \$6,073.18 was issued by the IRS to a payee in New York, New York. The name and address on this U.S. Treasury check were subsequently altered to the name and address of the defendant DESMOND ROBERTSON. On or about December 28, 2022, this altered U.S. Treasury check was deposited into an account at Bank-6 with an account number ending in 0762, which belonged to ROBERTSON (“ROBERTSON Account 2”).

22. On or about January 5, 2023, a withdrawal was made from ROBERTSON Account 2 in the amount of \$2,200.

II. The Paycheck Protection Program Scheme

23. The Paycheck Protection Program (“PPP”) was established by the U.S. government in 2020 to provide loans to help small businesses continue paying their workers during the COVID-19 pandemic. The loans were guaranteed by the U.S. Small Business Administration (“SBA”).

24. In or about and between February 2021 and June 2021, the defendants JAMEL WOODS, JUANITA EVANS, TROY MELVILLE, [REDACTED] and DESMOND ROBERTSON, together with others, engaged in a scheme to defraud the United States, Bank-2, Bank-3 and Bank-7 by submitting fraudulent applications for loans issued through the PPP and obtaining funds from those loans.

A. PPP Loan Obtained by JUANITA EVANS

25. In or about February 2021, the defendant JUANITA EVANS obtained a PPP loan after submitting fraudulent documentation.

26. To obtain the PPP loan, on or about February 11, 2021, the defendant JUANITA EVANS submitted to Lender-1, an entity the identity of which is known to the Grand Jury, a fraudulent application stating in substance that EVANS operated a business located in Jamaica, New York. In fact, EVANS did not operate a business at that location. EVANS also submitted a 2019 Schedule C (Form 1040) reporting a net profit of \$292,700 for a hairdresser business. In fact, EVANS did not earn that amount from that business.

27. On or about February 16, 2021, \$29,257 in PPP loan funds were credited to an account at Bank-2 with an account number ending in 2021, which belonged to the defendant JUANITA EVANS (“EVANS Account 3”). On or about the same day, withdrawals were made from EVANS Account 3 in the amounts of \$12,700 and \$800. On or about February 22, 2021, a withdrawal was made from EVANS Account 3 in the amount of \$3,000.

B. PPP Loans Obtained by [REDACTED]

28. In or about and between April 2021 and June 2021, the defendant [REDACTED] obtained two PPP loans by submitting fraudulent documentation. Funds from those loans were then converted into cashier’s checks payable to the defendant JAMEL WOODS.

29. In or about April 2021 and May 2021, in order to obtain the PPP loans, the defendant [REDACTED] submitted to Lender-2 and Lender-3, entities the identities of which are known to the Grand Jury, a 2019 Schedule C (Form 1040) reporting a net profit of \$85,597.00 for a performing arts business. In fact, [REDACTED] did not earn any income from a performing arts business.

30. On or about May 4, 2021, \$20,833.00 in PPP loan funds were credited to an account at Bank-7 with an account number ending in 1737, which belonged to the defendant JOSIAH [REDACTED] (“Account 2”). On or about the same day, a cashier’s check

for \$5,000.00 was withdrawn from [REDACTED] Account 2 and made payable to the defendant JAMEL WOODS. On or about the same day, that cashier's check was deposited into WOODS Account 1.

31. On or about June 25, 2021, an additional \$20,833.00 in PPP loan funds were credited to [REDACTED] Account 2. On or about the same day, another cashier's check for \$3,000.00 was withdrawn from [REDACTED] Account 2 and made payable to the defendant JAMEL WOODS.

C. PPP Loan Obtained by TROY MELVILLE

32. In or about June 2021, the defendant TROY MELVILLE obtained a PPP loan after submitting fraudulent documentation. Funds from that loan were then converted into cashier's checks payable to the defendant JAMEL WOODS.

33. To obtain the PPP loan, the defendant TROY MELVILLE submitted to Lender-4, an entity the identity of which is known to the Grand Jury, an image of a driver's license with an address in Brooklyn, New York. MELVILLE also submitted a fraudulent bank statement for a Bank-7 account with an account number ending in 8944 ("MELVILLE Account 3") for the period from January 29, 2020 to February 25, 2020. However, MELVILLE Account 3 was not opened until May 12, 2021. MELVILLE also submitted a 2019 Schedule C (Form 1040) reporting a net profit of \$85,597.00 for a performing arts business. In fact, MELVILLE did not earn any income from a performing arts business.

34. On or about June 10, 2021, \$20,832.00 in PPP loan funds were credited to MELVILLE Account 3. On or about the same day, a cashier's check for \$2,000.00 was withdrawn from MELVILLE Account 3 and made payable to the defendant JAMEL WOODS. On or about the same day, that cashier's check was deposited into WOODS Account 1.

D. PPP Loan Obtained by DESMOND ROBERTSON

35. In or about June 2021, the defendant DESMOND ROBERTSON obtained a PPP loan after submitting fraudulent documentation.

36. To obtain the PPP loan, the defendant DESMOND ROBERTSON submitted to Lender-2 an image of a driver's license with an address in Floral Park, New York. ROBERTSON also submitted a fraudulent bank statement for a Bank-3 account with an account number ending in 4560 ("ROBERTSON Account 3") for the period from February 1, 2020 to February 29, 2020. However, ROBERTSON Account 3 was not opened until April 13, 2021. ROBERTSON also submitted a 2019 Schedule C (Form 1040) reporting a net profit of \$54,882 for a barbershop. In fact, ROBERTSON did not earn any income from a barbershop.

37. On or about June 8, 2021, \$20,610 in PPP loan funds were credited to ROBERTSON Account 3. Between June 8, 2021 and July 8, 2021, those funds were used to make purchases from clothing stores, restaurants and rideshare companies, among other things. Additionally, on or about June 14, 2023, a withdrawal in the amount of \$7,000 was made from ROBERTSON Account 3.

III. The Identity Theft Scheme

38. In or about and between November 2021 and January 2023, the defendant RAPHAEL WILLIAMS used the personal identifying information of two victims in furtherance of the altered U.S. Treasury checks scheme.

A. The January 10, 2022 Deposit

39. On or about December 28, 2021, a U.S. Treasury check bearing serial number 83203543 in the amount of \$10,775.03 was issued by the IRS to a payee located in Brooklyn, New York. The name and address on this U.S. Treasury check were subsequently

altered to the name and address of Victim-1, an individual whose identity is known to the Grand Jury. On or about January 10, 2022, this altered U.S. Treasury check was deposited into an account at Bank-3 with an account number ending in 3186, which was opened using the personal identifying information (“PII”) of Victim-1 (“Victim-1 Account 3186”). On or about January 11, 2022, an electronic transfer in the amount of \$250.00 was made from Victim-1 Account 3186 to WOODS Account 1.

40. On or about April 4, 2022, a telephone number ending in 5511 (the “5511 Telephone Number”) was subscribed to in the name of Victim-1.

41. On or about April 7, 2022, the defendants JAMEL WOODS and RAPHAEL WILLIAMS had the following exchange through Telegram:

WILLIAMS	Ya zelle wrkin?
WOODS	Never tried it since I set it up
WILLIAMS	Send a 750 request to [The 5511 Telephone Number]
WOODS	One sec Did it
WILLIAMS	Wrong account. Send it to [10-digit number ending in 2045] That 5511 is my other Account lol

B. The April 7, 2022 Cash App Account Creation

42. On or about April 7, 2022, a Cash App account with a Cashtag in the name of Victim-2, an individual whose identity is known to the Grand Jury (“WILLIAMS Cash App Account 2”), was created using the PII of Victim-2. A photograph of a New York State driver’s license with a number ending in 516, which belonged to Victim-2, was fraudulently submitted as part of Cash App’s identity verification process. The telephone number associated with WILLIAMS Cash App Account 2 was the 5511 Telephone Number, which was subscribed to in the name of Victim-1.

43. From on or about April 8, 2022 to on or about March 18, 2023, WILLIAMS Cash App Account 2 engaged in approximately 40 Cash App transactions. From on or about June 8, 2022, to on or about February 7, 2023, WILLIAMS Cash App Account 2 received 13 payments totaling \$2,248.00 from WILLIAMS Cash App Account 1.

44. On or about April 6, 2023, a cash deposit in the amount of \$81.00 was made into WILLIAMS Cash App Account 2 at a Rite Aid located in Woodhaven, Queens, New York. Surveillance video of the cash deposit shows the defendant RAPHAEL WILLIAMS making the deposit.

COUNT ONE
(Wire Fraud and Bank Fraud Conspiracy – Altered U.S. Treasury Checks)

45. The allegations contained in paragraphs one through 44 are realleged and incorporated as if fully set forth in this paragraph.

46. In or about and between November 2021 and January 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JAMEL WOODS, also known as “Richard Carter,” JUANITA EVANS, TROY MELVILLE, [REDACTED] DESMOND ROBERTSON and RAPHAEL WILLIAMS, also known as “Fatboy,” together with others, did knowingly and intentionally conspire (a) to devise a scheme and artifice to defraud the United States Department of the Treasury and Bank-1, Bank-2, Bank-3, Bank-4, Bank-5 and Bank-6, financial institutions the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain money and property from them by means of one or more materially false and fraudulent pretenses, representations and promises, all affecting financial institutions and others, and for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce writings, signs, signals, pictures and

sounds, contrary to Title 18, United States Code, Section 1343; and (b) to execute a scheme and artifice to defraud Bank-1, Bank-2, Bank-3, Bank-4, Bank-5 and Bank-6, and to obtain moneys, funds, credits and other property owned by and under the custody and control of Bank-1, Bank-2, Bank-3, Bank-4, Bank-5 and Bank-6 by means of materially false and fraudulent pretenses, representations and promises, contrary to Title 18, United States Code, Section 1344.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

COUNTS TWO THROUGH SEVEN
(Bank Fraud – Altered U.S. Treasury Checks)

47. The allegations contained in paragraphs one through 44 are realleged and incorporated as if fully set forth in this paragraph.

48. On or about and between the dates set forth below, all dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants set forth below, together with others, did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud the banks set forth below, financial institutions the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits and other property owned by and under the custody and control of said banks by means of materially false and fraudulent pretenses, representations and promises.

Count	Approximate Dates	Victim Bank	Defendants
TWO	May 25, 2021 through May 23, 2022	Bank-1	JAMEL WOODS, also known as "Richard Carter," TROY MELVILLE, [REDACTED] [REDACTED] and DESMOND ROBERTSON
THREE	November 5, 2021 through December 23, 2022	Bank-2	JAMEL WOODS, also known as "Richard Carter," and [REDACTED] [REDACTED]
FOUR	December 28, 2021 through October 6, 2022	Bank-3	JAMEL WOODS, also known as "Richard Carter," JUANITA EVANS and RAPHAEL WILLIAMS, also known as "Fatboy"
FIVE	April 26, 2022 through September 20, 2022	Bank-4	JAMEL WOODS, also known as "Richard Carter," and JUANITA EVANS
SIX	November 22, 2022 through December 19, 2022	Bank-5	JAMEL WOODS, also known as "Richard Carter"
SEVEN	September 16, 2022 through January 5, 2023	Bank-6	JAMEL WOODS, also known as "Richard Carter," JUANITA EVANS and DESMOND ROBERTSON

(Title 18, United States Code, 1344, 2 and 3551 et seq.)

COUNT EIGHT
 (Conspiracy to Defraud the United States –
 Altered U.S. Treasury Checks)

49. The allegations contained in paragraphs one through 44 are realleged and incorporated as if fully set forth in this paragraph.

50. In or about and between November 2021 and January 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JAMEL WOODS, also known as "Richard Carter," JUANITA EVANS, TROY MELVILLE, [REDACTED] DESMOND ROBERTSON and

RAPHAEL WILLIAMS, also known as “Fatboy,” together with others, did knowingly and willfully conspire to defraud an agency of the United States, to wit: the United States Department of the Treasury, by obtaining the payment and allowance of false, fictitious and fraudulent claims, to wit: altering U.S. Treasury checks and depositing them into accounts belonging to people other than the intended payees.

(Title 18, United States Code, Sections 286 and 3551 et seq.)

COUNT NINE
(Wire Fraud and Bank Fraud Conspiracy – PPP Loans)

51. The allegations contained in paragraphs one through 44 are realleged and incorporated as if fully set forth in this paragraph.

52. In or about and between February 2021 and June 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JAMEL WOODS, also known as “Richard Carter,” TROY MELVILLE, [REDACTED] [REDACTED] and DESMOND ROBERTSON, together with others, did knowingly and intentionally conspire (a) to devise a scheme and artifice to defraud the SBA, Bank-2, Bank-3 and Bank-7 and to obtain money and property from them by means of one or more materially false and fraudulent pretenses, representations and promises, all affecting financial institutions and others, and for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce writings, signs, signals, pictures and sounds, contrary to Title 18, United States Code, Section 1343; and (b) to execute a scheme and artifice to defraud Bank-2, Bank-3 and Bank-7, financial institutions the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits and other property owned by and under the

custody and control of Bank-2, Bank-3 and Bank-7 by means of materially false and fraudulent pretenses, representations and promises, contrary to Title 18, United States Code, Section 1344.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

COUNTS TEN THROUGH TWELVE
(Bank Fraud – PPP Loans)

53. The allegations contained in paragraphs one through 544 are realleged and incorporated as if fully set forth in this paragraph.

54. On or about and between the dates set forth below, all dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants set forth below, together with others, did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud the banks set forth below, financial institutions the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits and other property owned by and under the custody and control of said banks by means of materially false and fraudulent pretenses, representations and promises.

Count	Approximate Dates	Victim Bank	Defendants
TEN	February 11, 2021 to February 16, 2021	Bank-2	JUANITA EVANS
ELEVEN	June 2021 to July 2021	Bank-3	DESMOND ROBERTSON
TWELVE	April 2021 to June 2021	Bank-7	JAMEL WOODS, also known as "Richard Carter," TROY MELVILLE and [REDACTED]

(Title 18, United States Code, 1344, 2 and 3551 et seq.)

COUNT THIRTEEN
(Conspiracy to Defraud the United States – PPP Loans)

55. The allegations contained in paragraphs one through 44 are realleged and incorporated as if fully set forth in this paragraph.

56. In or about and between February 2021 and June 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JAMEL WOODS, also known as “Richard Carter,” TROY MELVILLE, [REDACTED] [REDACTED] and DESMOND ROBERTSON, together with others, did knowingly and intentionally conspire to defraud an agency of the United States, to wit: the SBA, by obtaining the payment or allowance of false, fictitious and fraudulent claims.

(Title 18, United States Code, Sections 286 and 3551 et seq.)

COUNT FOURTEEN
(Aggravated Identity Theft)

57. The allegations contained in paragraphs one through 44 are realleged and incorporated as if fully set forth in this paragraph.

58. In or about and between November 2021 and January 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RAPHAEL WILLIAMS, also known as “Fatboy,” together with others, during and in relation to the crimes charged in Counts One and Four, did knowingly and intentionally transfer, possess and use, without lawful authority, one or more means of identification of one or more persons, knowing that the means of identification belonged to other persons.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), 1028A(c)(5), 2 and 3551 et seq.)

**CRIMINAL FORFEITURE ALLEGATION AS TO
COUNTS ONE THROUGH SEVEN, NINE AND TEN THROUGH TWELVE**

59. The United States hereby gives notice to the defendants charged in Counts One through Seven, Nine and Ten through Twelve that, upon their conviction of any such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such offenses, to forfeit any property constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

60. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1), to seek forfeiture of any other

property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(2) and 982(b)(1); Title 21, United States Code, Section 853(p))

A TRUE BILL



The signature is handwritten in black ink, appearing to read "Thomas J. Parodis". It is written in a cursive style with a horizontal line underneath the name.

FOREPERSON

By Carolyn Pokorny, Assistant U.S. Attorney
BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2022R00986
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of NEW YORK*

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

v.s.

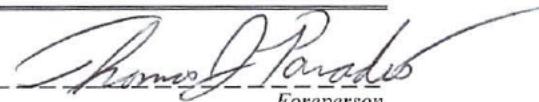
JAMEL WOODS, JUANITA EVANS, TROY MELVILLE, [REDACTED]
[REDACTED] DESMOND ROBERTSON, and RAPHAEL WILLIAMS

Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 286, 982(a)(2), 982(b)(1), 1028A(a)(1), 1028A(b),
1028A(c)(5), 1344, 1349, 2 and 3551 *et seq.*; T. 21, U.S.C., § 853(p))

A true bill.



Foreperson

Filed in open court this _____ day of _____ A.D. 20 ____

Clerk

Bail, \$ _____

Andrew M. Roddin, Assistant U.S. Attorney (718) 254-6455
Russell W. Noble, Assistant U.S. Attorney (718) 254-6178